

1 JON M. SANDS  
Federal Public Defender  
2 **BENJAMIN D. SINGERMANN**  
Assistant Federal Public Defender  
3 California State Bar No. 242725  
407 W. Congress St., Suite 501  
4 Tucson, AZ 85701  
Telephone: (520) 879-7500  
5 ben\_singerman@fd.org  
Attorney for Defendant  
6

7 IN THE UNITED STATES DISTRICT COURT  
8 FOR THE DISTRICT OF ARIZONA  
9

10 United States of America,  
11 Plaintiff,  
12 vs.  
13 Aaron Thomas Mitchell,  
14 Defendant.

CR22-01545-TUC-RM (EJM)

**UNOPPOSED MOTION TO  
DESIGNATE CASE AS COMPLEX  
(No Oral Argument Requested)**

15 It is expected that excludable delay under Title 18, United States Code,  
16 §3161(h)(7) will occur as a result of this motion or an order based thereon.

17 Pursuant to LRCrim 16.2 and 18 U.S.C. § 3161(h)(7)(B)(ii), defendant, through  
18 counsel, respectfully requests that this court designate the above-referenced matter as a  
19 complex case, based upon the following:

20 The government has disclosed over 73,000 pages of discovery in this matter, along  
21 with video and audio recordings. Moreover, discovery is still ongoing, and the defense  
22 expects to receive additional disclosure from the government soon. Already disclosed  
23 materials include DNA testing data and cell phone extraction files that not only require  
24 significant time to fully review, but which necessitate the use of qualified experts in their  
25 respective fields in order to properly prepare for trial and to represent Mr. Mitchell in a  
26 competent manner.  
27  
28

1 Based upon the foregoing, Mr. Mitchell moves the Court to designate the case as  
2 complex, vacate the discovery/disclosure/notice/request deadline and pretrial motions  
3 deadline set in the June 20 Scheduling Order (Doc. 55) as premature, and set a status  
4 conference to discuss scheduling and other case management matters.

5 Assistant United States Attorney Carin C. Duryee does not object to this request.

6 RESPECTFULLY SUBMITTED this 22nd day of June, 2023.

7  
8 JON M. SANDS  
Federal Public Defender

9 /s/ Benjamin D. Singerman  
10 BENJAMIN D. SINGERMAN  
Assistant Federal Public Defender  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28